



SIDLEY AUSTIN LLP
787 SEVENTH AVENUE
NEW YORK, NY 10019
(212) 839 5300
(212) 839 5599 FAX

sbierman@sidley.com
(212) 839-5510

BEIJING	HONG KONG	SHANGHAI
BOSTON	HOUSTON	SINGAPORE
BRUSSELS	LONDON	SYDNEY
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September 4, 2015

By ECF and Hand Delivery

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: *ICICI Bank UK plc v. Cargill, Incorporated and Cargill Financial Services International, Inc.*, Case No. 15-5379

Dear Judge Caproni:

We represent defendants Cargill, Incorporated and Cargill Financial Services International, Inc. Pursuant to your Individual Practices in Civil Cases, and with the consent of counsel for all parties, we write to request an extension of time, to September 11, 2015, of the time within which the parties may submit an agreed Proposed Protective Order. The Civil Case Management Plan and Scheduling Order (ECF No. 20) entered in this case provides that such agreed Proposed Protective Order is due today; however, in order to reach agreement between all three parties to this case, including the recently-joined Third Party Defendant The Receivables Exchange, LLC, the parties require the requested additional time. This is the parties' first request for an extension of time with respect to the proposed Protective Order. As noted above, counsel for Plaintiff ICICI Bank UK plc and counsel for Third-Party Defendant The Receivables Exchange, LLC consent to this request.

Respectfully submitted,

/s/ Steven M. Bierman

Steven M. Bierman



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cc: Michael Sullivan, Esq., Counsel for Plaintiff (by ECF and e-mail)
Glenn Burlingame, Esq., Counsel for Third-Party Defendant (by e-mail)